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Attorneys for Defendant
10 ROBLOX CORPORATION

11 UNITED STATES DISTRICT COURT
12
13 NORTHERN DISTRICT OF CALIFORNIA
14 OAKLAND DIVISION

15 JANE DOE,

16 Plaintiff,

17 v.

18 ROBLOX CORPORATION; DISCORD INC.;
19 and DOES 1-50, inclusive,

20 Defendants.

Case No. 4:25-cv-03520-YGR

**JOINT STIPULATION AND [PROPOSED]
ORDER REGARDING CASE MANAGEMENT**

TRIAL DATE: NOT YET SET

Date Action Removed: April 22, 2025

1 Plaintiff Jane Doe (“Plaintiff”) and Defendants Roblox Corporation (“Roblox”) and
 2 Discord Inc. (“Discord”) (collectively the “Defendants”), by and through their respective counsel
 3 of record, (collectively “the Parties”), pursuant to Civil Local Rules 6-2 and 7-12, hereby stipulate
 4 as follows:

5 WHEREAS, on April 21, 2025, Plaintiff filed an unverified Complaint for Damages
 6 (“Complaint”) in the Superior Court for the State of California, in and for the County of San
 7 Francisco, thereby initiating the civil action, identified as Case No. CGC25624596, *Jane Doe v.*
 8 *Roblox Corporation* (ECF No. 1-1);

9 WHEREAS, on April 22, 2025, Roblox removed this action to the United States District
 10 Court for the Northern District of California (ECF No. 1);

11 WHEREAS, on April 23, 2025, this case was assigned to Judge Yvonne Gonzalez Rogers
 12 (ECF No. 9);

13 WHEREAS, on May 6, 2025, Plaintiff and Defendant Roblox stipulated that Roblox’s
 14 responsive pleading deadline would be the same as Discord’s (ECF No. 12);

15 WHEREAS, on May 21, 2025, Defendants Roblox and Discord received by personal
 16 service a copy of the Complaint (ECF Nos. 15, 16);

17 WHEREAS, on May 30, 2025, the Parties stipulated that Defendants’ deadline to answer
 18 or otherwise respond to the Complaint would be June 27, 2025; Plaintiffs’ opposition to any
 19 motions in response would be due on July 25, 2025; and Defendants’ replies in support of any
 20 motions in response would be due on August 8, 2025 (ECF No. 17);

21 WHEREAS, on June 13, 2025, Plaintiff filed an administrative motion to consider
 22 whether *Doe v. Roblox Corp.*, 3:25-cv-04329-RFL (the “Judge Lin Action”), currently pending
 23 before Judge Rita F. Lin of this district, should be related to this action (the “Motion to Relate
 24 Cases”) (ECF No. 18);

25 WHEREAS, Defendants have informed Plaintiff that they may move to compel arbitration
 26 of this matter and seek limited early discovery relative to the arbitrability of Plaintiff’s claims;

27 WHEREAS, on June 16, 2025, the Parties appeared before Judge Yvonne Gonzalez
 28 Rogers at which the Court ordered the parties to submit a stipulation related to various case

1 management issues in this matter and the parties agreed that they would stay Roblox's deadline to
 2 respond to the complaint in the Judge Lin Action.

3 WHEREAS, good cause exists for modifying deadlines in this matter to facilitate
 4 adjudication of the threshold question of arbitrability since doing so could potentially conserve
 5 limited party and judicial resources;

6 NOW, THEREFORE, the Parties, through their respective counsel, stipulate as follows:

- 7 1. Defendants' responsive pleading deadlines are stayed pending resolution of the Parties'
 8 dispute concerning whether this matter shall be referred to arbitration;
- 9 2. Plaintiff's Motion to Relate Cases is similarly stayed pending resolution of the Parties'
 10 dispute concerning whether this matter shall be referred to arbitration;
- 11 3. The parties in the Judge Lin Action shall file a stipulation in that case reflecting their
 12 agreement regarding arbitration-related discovery and staying Roblox's deadline to
 13 respond to the complaint until this Court adjudicates Plaintiff's Motion to Relate Cases;
 14 and
- 15 4. The Parties stipulate that Plaintiffs will provide Defendants with all applicable usernames
 16 and email addresses by June 24, 2025. Defendants reserve the right to seek additional
 17 discovery related to the arbitrability of Plaintiff's claims and nothing in this stipulation
 18 shall be used as a basis to argue Defendants waived any rights to seek such discovery.
 19 The parties further stipulate that any motion to compel arbitration should be heard on the
 20 following briefing schedule:

- 21 a. July 28, 2025: Defendants to file opening brief(s) for any motion to compel
 22 arbitration.
- 23 b. August 28, 2025: Plaintiff's opposition(s) to any motion(s) to compel arbitration.
- 24 c. September 12, 2025: Defendants to file reply briefs in support of any motions to
 25 compel arbitration.
- 26 d. Hearing date: To be set at the Court's convenience at the first available date
 27 following the submission of all briefing.

28

1 **IT IS SO STIPULATED.**

2 Dated: June 23, 2025

COOLEY LLP

3
4 /s/ Matthew D. Caplan

5 Matthew D. Caplan

6 Attorneys for Defendant
7 ROBLOX CORPORATION

8 Dated: June 23, 2025

MORRISON & FOERSTER LLP

9 /s/ J. Alexander Lawrence

10 J. Alexander Lawrence

11 Attorneys for Defendant
12 DISCORD INC.

13 Dated: June 23, 2025

ANAPOL WEISS

14 /s/ Alexandra M. Walsh

15 Alexandra M. Walsh

16 Attorneys for Plaintiff
17 JANE DOE

18 **ATTESTATION**

19 Pursuant to Civil Local Rule 5-1(i)(3), I hereby attest that all signatories listed, and on
20 whose behalf the filing submitted, concur in the filing's content and have authorized the filing.

21 Dated: June 23, 2025

22 By: /s/ Matthew D. Caplan

23 Matthew D. Caplan

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: _____

HON. YVONNE GONZALEZ ROGERS
United States District Judge